

MEMO ENDORSED**Kennedys**

Our ref 1181230

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Via ECF

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January 28, 2025

RE: *UDG Management, LLC, Ed Edison Corp., UDG Holdings, LLC, Jeong Hoon Kim, and Eun Mee Baek aka Jina Baek v. Ironshore Indemnity Corp.,*
Case No. 1:24-cv-02777

Dear Judge Caproni,

We represent Defendant Ironshore Indemnity, Inc. (“Ironshore”) in the above-captioned insurance coverage matter. We write jointly with Plaintiffs’ counsel with respect to the Court’s January 23, 2025 Order (“January 23 Order”) (Dkt. 41).

By way of background, on January 23, 2025, Defendant filed a letter raising certain discovery issues and requesting guidance from this Court regarding these issues (Dkt. 40). The same day, this Court issued an Order (Dkt. 41) requesting the parties meet and confer in person by January 29, 2025, and scheduling a conference on Friday, January 31, 2025, at 10:00am in Courtroom 20C, in the event the parties could not resolve the discovery issues by January 29, 2025.

We have learned from Plaintiffs’ counsel that he had a slip and fall on his staircase, and he requested that we meet via Zoom instead of in person. Plaintiffs’ counsel seeks leave to hold the Court’s mandated in-person meeting via Zoom. Given the circumstances presented by Plaintiffs’ counsel, Defendant has no objections to a Zoom meet and confer, which the parties have already scheduled for January 29, 2025 at 11:30am to 12:30pm in accordance with the Court’s Order.

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We further write to advise the Court of a conflict Defendant's counsel has on January 31, 2025. Specifically, we have an arbitration hearing that had been scheduled nearly two weeks prior to the January 23 Order based on the availability of all parties involved in the arbitration.

Accordingly, we respectfully request the Court to consider moving the 10am January 31 conference, if possible. We are hopeful that the parties' meet and confer may resolve some or all of Defendant's concerns, as Defendant understands that Plaintiffs are currently exploring a resolution to the deficiencies raised by Defendant. Both parties are available February 6 and February 7, 2025 for a conference in the event the parties cannot resolve all discovery issues. To this end, as requested by the January 23 Order, the parties will jointly report to the Court on January 30 by 12pm whether a conference will be necessary and outline any unresolved discovery issues.

We respectfully await the Court's directive.

Respectfully submitted



Eridania Perez

Cc:

Michael Kimm, Esq., (via ECF)

Gary S. Kull, Esq. (via ECF)

Application GRANTED. The parties' meet and confer scheduled for January 29, 2025 can occur via zoom.

The conference scheduled for January 31, 2025 at 10:00 A.M. is ADJOURNED to February 7, 2025 at 10:00 A.M., if necessary, in Courtroom 20C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007.

SO ORDERED.

1/28/25



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE